

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)

v.)

ANIKKHAN YUSUFKHAN PATHAN,)

Defendant.)

Case No. 1:19-MJ-499

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Warren Buckley, Special Agent of the U.S. Department of Homeland Security (DHS) Office of Inspector General (OIG), being duly sworn, depose and state the following:

INTRODUCTION

1. I am employed as a Special Agent of the DHS OIG and have been so employed since March 2017. I am currently assigned to the DHS OIG's Digital Forensics and Analysis Unit in Washington, D.C. Prior to this position, I served as a Special Agent with the U.S. Secret Service and the U.S. Nuclear Regulatory Commission. During my tenure with these agencies, I have participated in numerous criminal investigations of white collar crimes, including violations of Title 18, United States Code, Section 1343 (Wire Fraud), and related offenses.

2. The facts set forth in this affidavit are based upon my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other investigators, communications with others, including individuals who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. This affidavit is submitted for the limited purpose of establishing probable cause in support of an application for a criminal complaint, and thus, it does not contain every fact known by me or the United States.

3. This affidavit is submitted in support of a criminal complaint charging **ANIKKHAN YUSUFKHAN PATHAN ("PATHAN")** with, from in or around April 2017 to on or about September 13, 2017, in the Eastern District of Virginia, and elsewhere, having knowingly devised and intending to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice to defraud, knowingly transmitted and caused to be transmitted by means of wire communications in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

BACKGROUND

4. In the spring of 2017, DHS OIG conducted an investigation of a scheme to defraud that occurred in Wisconsin and elsewhere. Based on information obtained from that investigation, your affiant, along with investigators from the U.S. Department of Health and Human Services and the Fairfax County Police Department, initiated a criminal investigation into **PATHAN** and his associates, the results of which are summarized in this affidavit.

5. **PATHAN** is an Indian national present in the U.S. since January 2015 under a Non-Immigrant, F1 Student Visa, and currently resides at 125 S. Reynolds Street, Unit J503, Alexandria, Virginia, located in the Eastern District of Virginia. **PATHAN** previously resided at 7900 John Adams Court, Unit 202, Annandale, Virginia, also located in the Eastern District of Virginia. **PATHAN** owns a black 2003 Volvo S40 sedan with Virginia license plates AYP. He currently attends the Virginia University of Oriental Medicine, located in Fairfax, Virginia, and previously attended iGlobal University and the American College of Commerce and Technology, located in Falls Church, Virginia. During the time the criminal offenses took place in 2017,

PATHAN was unemployed and did not earn any wage or salary, according to Virginia, Maryland, and District of Columbia employment records.

THE SCHEME TO DEFRAUD

6. **PATHAN** and his associates defrauded victims in a manner described in greater detail below. In general, associates of **PATHAN** would contact victims by telephone and make materially false misrepresentations. Based on these representations, victims sent money via money transfer services such as MoneyGram, Ria, and Western Union to fictitious individuals identified by **PATHAN's** associates. **PATHAN** acquired driver's licenses in the names of these fictitious individuals. **PATHAN** would then visit numerous money transfer locations throughout the Eastern District of Virginia and use fraudulent driver's licenses to retrieve the fraud proceeds. Finally, **PATHAN** would deposit the proceeds into bank accounts of his associates while keeping a percentage of the money for himself.

7. In one of the schemes, associates of **PATHAN** created a website purporting to offer loans. Victims applied for loans online through the website by providing personal information including their name, Social Security number, date of birth, bank, employer, and home address. Upon application, victims received a phone call from an individual seeking to verify the personal information the victims provided through the loan website. The callers told the victims that, in order to verify the victims' bank accounts, the callers would deposit thousands of dollars into the bank accounts of the victims and then the victims would need to withdraw the money and return it to the callers via a money transfer service. The callers gave the victims the names of individuals to whom they should direct the money transfers, including names that were aliases of **PATHAN**. Associates of **PATHAN** deposited fraudulent checks into the accounts of the victims. The victims then withdrew the funds that were available from the deposits and transferred the money via

MoneyGram, Ria, and Western Union to the names they were given by the callers. Victims only realized that the deposited checks were worthless when they were informed by their banks that the deposited checks were fraudulent. Some victims were held responsible for the entire amount of the fraudulent checks.

8. In another scheme, associates of **PATHAN** impersonated banks and mortgage companies and offered victims loan consolidation, modification, and refinancing. Associates of **PATHAN** contacted victims by telephone or by mail via flyers that included a telephone number that victims then called. In some instances, the callers claimed to be the actual companies that held the mortgages of the victims, providing the victims with private details such as the victims' account numbers, amounts of the mortgages held by the victims, and names of victims' family members. Associates of **PATHAN** sent victims official-looking documents with logos of the companies the associates claimed to represent. The callers directed victims to make their loan, mortgage payments, or payments of fees associated with their new rates via MoneyGram, Ria, or Western Union to various names given to them by the callers, including names that were aliases of **PATHAN**.

9. In another scheme, associates of **PATHAN** called victims and claimed to work for Microsoft. The callers told victims that their computers had viruses and that the computers would shut down unless fees were paid to the callers to fix the computers. Victims gave the callers their credit card numbers, which were then used to purchase Western Union money orders online, as well as serial numbers from the backs of various gift cards. Victims sent money to associates of **PATHAN** via MoneyGram, Ria, and Western Union. The callers gave the victims the names of unknown individuals to whom they should direct the money transfers, including names that were aliases of **PATHAN**.

10. After victims transferred money via MoneyGram, Ria, and Western Union to the names given to them by the callers, **PATHAN** retrieved the money from various money transfer locations throughout the Eastern District of Virginia.

11. Associates of **PATHAN** instructed **PATHAN** in how and where to deposit the money he retrieved from the money transfer companies. **PATHAN** deposited the money into accounts of his associates at banks located within the Eastern District of Virginia, keeping for himself a percentage of the deposits, and did so knowing that the money was proceeds of fraud.

12. Based on the materially false and fraudulent pretenses, representations, and promises made by **PATHAN** and his associates, victims transferred approximately \$147,000 via MoneyGram, Ria, and Western Union to names that were aliases of **PATHAN**.

13. In order to effectuate the scheme, **PATHAN** possessed approximately 66 fraudulent driver's licenses from Ohio and one fraudulent driver's license from Indiana that contained the names of the aliases that his associates provided to the victims. The fraudulent driver's licenses contained **PATHAN**'s true photograph. **PATHAN** used the fraudulent driver's licenses at money transfer locations throughout the Eastern District of Virginia to collect the funds sent to his aliases. **PATHAN** has been identified through video surveillance as the individual entering and exiting businesses in the Eastern District of Virginia to collect money from wire transfer services on many of the same dates and times that victims' money transfers were retrieved by an individual using aliases of **PATHAN**, as confirmed by business records.

14. **PATHAN** drove to and from the money transfer locations in a black 2003 Volvo S40 sedan with Virginia license plates AYP. Images of the vehicle were captured on surveillance video from various businesses with money transfer locations on the same dates and at the same times that **PATHAN** retrieved money from those locations using aliases, as verified by records

and receipts from the money transfer businesses. On one occasion, after **PATHAN** used an alias and fraudulent driver's license to collect money from a MoneyGram located in a Walmart in Alexandria, Virginia, a store employee photographed **PATHAN** leaving the store and entering a dark sedan with Virginia license plate AYP. Law enforcement databases confirm that a Virginia license plate AYP is registered to **ANIKKHAN YUSUFKHAN PATHAN** and that the 2003 Volvo S40 sedan is the only vehicle registered to **PATHAN**. I compared the surveillance footage from multiple money transfer locations, the photograph taken by the store employee, and a photograph of **PATHAN** from the Virginia Department of Motor Vehicles and determined that it is **PATHAN** who appears in the surveillance footage and the employee's photograph.

15. On August 7, 2017, pursuant to a warrant issued by the U.S. District Court in the Eastern District of Virginia, agents installed a mobile tracking device on **PATHAN's** black S40 Volvo sedan with Virginia license plates AYP. Subsequent monitoring of **PATHAN's** vehicle showed the vehicle visited multiple money transfer locations on the same dates and at the same times that an individual collected sums of money from those locations using aliases of **PATHAN**.

16. On September 13, 2017, law enforcement officials executed search warrants, issued by the U.S. District Court in the Eastern District of Virginia, on **PATHAN's** residence and vehicle. Investigators seized **PATHAN's** cell phone, 66 counterfeit Ohio driver's license and one counterfeit Indiana driver's license all bearing **PATHAN's** photograph and different fake names, including aliases to whom victims sent money. Authorities also found MoneyGram receipts and \$2,210 in cash.

17. Forensic analysis of **PATHAN's** cell phone showed conversations within WhatsApp, an encrypted messaging application, between **PATHAN** and an unknown associate who provided **PATHAN** with information necessary to collect the victims' money and make the

subsequent deposits: victims' names, their cities and states of residence, monetary amounts to be retrieved, which money transfer service was used, and accompanying reference numbers. **PATHAN** would retrieve the fraudulently-obtained funds per these instructions and then deposit the funds into bank accounts as directed by his associates, confirming with his associates via text when he had done so. **PATHAN** occasionally sent his associate photographs of receipts that reflected the sums of money he deposited into specific bank accounts.

18. **PATHAN**, after being advised of his Miranda Rights and agreeing to be interviewed on September 13, 2017, admitted to working with individuals in India to facilitate the scheme and using the counterfeit driver's licenses to retrieve approximately \$150,000 of stolen funds that he collected from numerous MoneyGram, Ria, and Western Union locations across Northern Virginia, including in the Eastern District of Virginia. **PATHAN** further admitted knowledge of the criminality of the scheme, stating, "I know [my associates] are doing wrong." **PATHAN** admitted that the \$2,210 cash found in his residence was proceeds of the fraud scheme. **PATHAN** estimated that he personally earned approximately \$10,000 from the scheme.

SPECIFIC INSTANCES OF WIRE FRAUD

19. The below paragraphs set forth specific examples of the hundreds of transactions facilitated by **PATHAN** and his associates and demonstrate how they executed the schemes to defraud the victims.

VICTIM-1 ("V-1")

20. On or about May 1, 2017, an individual identified herein as VICTIM-1 ("V-1") sought a loan online by visiting a website for CashNetUSA. After submitting an application through the website, V-1 received a text message on May 9, 2017 from an individual claiming to be Victor Reid from CashNetUSA who told V-1 that V-1 had been approved for a \$5,000 loan.

Victor told V-1 that, in order for him to verify V-1's trustworthiness, Victor would deposit a check into V-1's bank account and then V-1 would need to withdraw that money and send it back to Victor via MoneyGram. On or about May 9, 2017, after Victor deposited money into V-1's bank account, V-1 visited a money transfer service located in a Walmart in Lakeland, Florida, and at approximately 4:26 p.m., used a debit card to transfer \$950 via MoneyGram to Victor Reid, which is an alias of **PATHAN**. At approximately 8:22 p.m., **PATHAN** retrieved \$950 via MoneyGram from a Walmart in Alexandria, Virginia, within the Eastern District of Virginia, using a fraudulent Ohio driver's license bearing the name Victor Reid. This driver's license was found in **PATHAN's** residence on September 13, 2017.

21. V-1 was later notified by V-1's bank that the deposit to V-1's account made by Victor was fraudulent and that V-1 would incur the loss resulting from V-1's withdrawal of the funds.

22. Surveillance footage dated May 9, 2017, obtained from security cameras inside the Walmart in Alexandria, Virginia, shows an Indian male of slim build matching the description of **PATHAN** conducting a transaction at a money transfer service location at approximately 8:22 p.m.

VICTIM-2 ("V-2")

23. In or around January 2017, an individual identified herein as VICTIM-2 ("V-2") received a phone call from an individual purporting to work for Bank of America. Bank of America holds V-2's mortgage. The caller claimed that V-2 could lower V-2's monthly home payment by enrolling in a reduced payment program. The individual emailed V-2 official-looking documents and also sent V-2 official-looking information via regular mail to V-2's home. V-2 was told that, in order to participate in the program, V-2 would need to send money to various

individuals via money transfer services instead of making payments to the bank. The caller told V-2 that if V-2 continued to make payments to the bank, it would be assumed that V-2 did not need the financial discount and V-2 would be removed from the reduced payment program.

24. On or about June 19, 2017, V-2 visited a money transfer service located in El Monte, California, and at approximately 2:43 p.m., used cash to transfer \$996.50 via MoneyGram to Paolo Delima, a name given to V-2 by the caller and which is an alias of **PATHAN**. At approximately 6:32 p.m., **PATHAN** retrieved \$996.50 via MoneyGram from a Walmart in Falls Church, Virginia, within the Eastern District of Virginia, using a fraudulent Ohio driver's license bearing the name Paolo Delima. This driver's license was found in **PATHAN's** residence on September 13, 2017.

25. Surveillance footage dated June 19, 2017, obtained from security cameras inside the Walmart in Alexandria, Virginia, and its parking lot, shows an Indian male of slim build conducting a money transfer transaction at approximately 6:32 p.m. Footage of the parking lot shows this same individual arriving to the Walmart in a dark colored sedan.

VICTIM-3 ("V-3")

26. On or about August 16, 2017, an individual identified herein as VICTIM-3 ("V-3") sought a loan online by using a searching engine to find and visit an unknown website that claimed to offer loans. To apply for the loan, V-3 completed an online form wherein V-3 provided personal information including V-3's name, Social Security number, date of birth, bank, employer, phone number, and address. Hours after submitting the form through the website, V-3 received a telephone call from an individual claiming to be Alex from NetUSA with phone number 619-356-6242. Alex asked V-3 questions about the information V-3 submitted online in what he said was an effort to verify the information. Alex told V-3 that, in order for him to verify V-3's bank

account, he would deposit a check for \$4,999.19 into V-3's bank account and then V-3 would need to withdraw that money and send it back to Alex via MoneyGram. V-3 visited a money transfer service located in a Walmart in San Antonio, Texas, and at approximately 4:58 p.m., used his bank card to transfer \$983 via MoneyGram to Abraham Basson, a name given to V-3 by Alex and which is an alias of **PATHAN**. Alex stayed on the phone with V-3 during the transaction.

27. On or about August 16, 2017, at approximately 6:04 p.m., **PATHAN** retrieved \$983 via MoneyGram from a money transfer service located in Falls Church, Virginia, within the Eastern District of Virginia, using a fraudulent Ohio driver's license bearing the name Abraham Basson. This driver's license was found in **PATHAN's** residence on September 13, 2017.

28. The next day, V-3 learned from his bank that the deposit made by Alex was fraudulent and that V-3 was being held responsible by the bank for the entire amount of the fraudulent check.

VICTIM-4 ("V-4")

29. On or about August 30, 2017, an individual identified herein as VICTIM-2 ("V-4") sought a loan online by visiting an unknown website that claimed to offer loans. To apply for the loan, V-4 completed an online form wherein he provided personal information including his name, Social Security number, date of birth, and phone number. Soon after submitting the form through the website, V-4 received a telephone call from an individual claiming to be James Thompson. James said that V-4 had been approved for the loan, but that in order for him to verify V-4's bank account, he would deposit an amount of money into V-4's bank account and then V-4 would need to withdraw that money and send it back to James via MoneyGram. Over the next few days, James deposited checks in V-4's bank account worth over \$2,900. V-4, whose job requires him to travel

across the country, then made MoneyGram transfers from Nevada, Utah, and Idaho, sending the money to names given to him by James.

30. Specifically, on or about September 2, 2017, V-4 visited a money transfer service located in a Walmart in Meridian, Idaho, and at approximately 10:32 a.m., transferred \$950 via MoneyGram to Jason Montijo, a name given to V-4 by James and which is an alias of **PATHAN**. At approximately 10:37 a.m., V-4 made another transfer of \$950 via MoneyGram from the same location to Moises Bernan, a name given to V-4 by James and which is an alias of **PATHAN**. At approximately 10:49 a.m., **PATHAN** retrieved \$950 via MoneyGram from a money transfer service in Alexandria, Virginia, within the Eastern District of Virginia, using a fraudulent Ohio driver's license bearing the name Jason Montijo. At approximately 11:35 a.m., **PATHAN** retrieved another \$950 via MoneyGram from a different money transfer service located in Falls Church, Virginia, within the Eastern District of Virginia, using a fraudulent Ohio driver's license bearing the name Moises Bernan. Ohio driver's licenses with the names Jason Montijo and Moises Bernan were found in **PATHAN's** residence on September 13, 2017.

31. V-4's bank notified V-4 that the checks deposited by James were fraudulent.

32. Surveillance footage dated September 2, 2017, obtained from security cameras inside a business in Alexandria, Virginia, show an Indian male of slim build matching **PATHAN's** description conducting a MoneyGram transaction at approximately 11:35 a.m.

VICTIM-5 ("V-5")

33. On or about September 6, 2017, an individual identified herein as VICTIM-5 ("V-5") received a telephone call from a person claiming to work for Microsoft who told V-5 that V-5's computer had a virus and would shut down unless V-5 paid the caller fees to fix the computer. V-5 provided the caller his credit card number (ending in 9213) and the serial numbers

from the back of iTunes gift cards he purchased to pay the fees. The credit card ending in 9213 was used at approximately 3:48 p.m. to purchase a \$700 Western Union money order online that was sent to Zack Sigler, which is an alias of **PATHAN**. **PATHAN** retrieved the \$700 via Western Union at approximately 6:28 p.m. at a money transfer service located in Arlington, Virginia, within the Eastern District of Virginia, using a fraudulent Ohio driver's license bearing the name Zack Sigler. **PATHAN** used the address of 6710 Commerce Street in Springfield, Virginia, which is the location of a Courtyard by Marriot hotel. The Ohio driver's license with the name Zack Sigler was found in **PATHAN's** residence on September 13, 2017.

VICTIM-6 ("V-6")

34. In or around July 17, 2017, an individual identified herein as VICTIM-6 ("V-6") received a telephone call from Adam Green, who claimed to work for Freedom Mortgage, which is the company that held V-6's mortgage at the time. Adam told V-6 that V-6 could refinance their home at a fixed two percent rate for the remainder of the term of the mortgage under a VA loan. Adam knew details of V-6's mortgage, including the account number, and sent V-6 emails with documents that contained a Freedom Mortgage logo. From July 2017 through September 2017, V-6 sent approximately \$6,000 via money transfer services to individuals across the U.S. whose names V-6 was given by Adam. On or about September 6, 2017, V-6 visited a money transfer service located in a Walmart in Shelby Township, Michigan, and at approximately 2:07 p.m., transferred \$709.03 via MoneyGram to Zack Sigler, a name given to V-6 by Adam and which is an alias of **PATHAN**. At approximately 3:01 p.m., **PATHAN** retrieved the \$709.03 via MoneyGram from a money transfer service located in Arlington, Virginia, within the Eastern District of Virginia, using a fraudulent Ohio driver's license bearing the name Zack Sigler. This driver's license was found in **PATHAN's** residence on September 13, 2017.

VICTIM 7 ("V-7")

35. On or about September 11, 2017, an individual identified herein as VICTIM-7 ("V-7") received a telephone call from a person who claimed to work for Caliber Home Mortgage, which is the company that held V-7's mortgage at the time. The person knew details about V-7's mortgage, such as the amount remaining on the mortgage and V-7's parents' names. The caller advised V-7 that he could lower V-7's mortgage payment from \$1500 to \$935, but that in order to do so, V-7 was first required to pay \$900 via Western Union. At V-7's direction, V-7's son visited a Western Union located in a Safeway in Pasadena, Maryland, and at approximately 5:47 p.m., transferred \$500 to Wladimir Anita, a name given to V-7 by the caller and which is an alias of **PATHAN**. At approximately 7:24 p.m., **PATHAN** retrieved the \$500 via Western Union from a money transfer service located in Falls Church, Virginia, within the Eastern District of Virginia, using a fraudulent Ohio driver's license bearing the name Wladimir Anita. **PATHAN** used the address of 6710 Commerce Street in Springfield, Virginia, which is the location of a Courtyard by Marriot hotel. The Ohio driver's license with the name Wladimir Anita was found in **PATHAN**'s residence on September 13, 2017.

VICTIM-8 ("V-8")

36. In or around March 2017, an individual identified herein as VICTIM-8 ("V-8") received a telephone call from Bradley Cooper, who claimed to work for Ditec Mortgage and offered to consolidate V-8's loan at a lower rate. Bradley said that V-8 could enter into a 9-month trial in which V-8 would pay \$550 per month, at the end of which her permanent monthly loan payment would be \$550. Bradley gave V-8 a toll free number that V-8 used on numerous occasions to contact Bradley. Between approximately March 2017 and October 2017, V-8 sent over \$7,000 via money transfer services to names give to V-8 by Bradley. Specifically, on or

about September 11, 2017, at approximately 3:39 p.m., V-8 purchased online by credit card a \$550 Western Union money order that was sent to Wladimir Anita, which is an alias of **PATHAN**. At approximately 5:25 p.m., **PATHAN** retrieved the \$550 via Western Union from a money transfer service located in Falls Church, Virginia, within the Eastern District of Virginia, using a fraudulent Ohio driver's license bearing the name Wladimir Anita. **PATHAN** used the address of 6710 Commerce Street in Springfield, Virginia, which is the location of a Courtyard by Marriot hotel.

37. The next day, on or about September 12, 2017, at approximately 11:45 a.m., V-8 purchased online by credit card a \$600 Western Union money order that was sent to Leslie Calister, which is an alias of **PATHAN**. **PATHAN** retrieved the \$600 via Western Union at approximately 12:57 p.m. at a money transfer service located in Arlington, Virginia, within the Eastern District of Virginia, using a fraudulent Ohio driver's license bearing the name Leslie Calister. **PATHAN** used the address of 6710 Commerce Street in Springfield, Virginia, which is the location of a Courtyard by Marriot hotel. Ohio driver's licenses with the names Wladimir Anita and Leslie Calister were found in **PATHAN**'s residence on September 13, 2017.

38. V-8 became aware of being defrauded when a realtor appeared at V-8's home to ask if V-8 wanted to sell the home as it was in foreclosure.

VICTIM-9 ("V-9")

39. In September 2017, an individual identified herein as VICTIM-9 ("V-9") received a telephone call from a person who claimed to work for Chase Bank. The caller offered V-9 a loan modification. The caller emailed V-9 official-looking documents and forms on Chase letterhead that were to be completed by V-9. Over the next few months, V-9 paid approximately \$20,000 via MoneyGram and Western Union to individuals whose names she received from the caller. Specifically, on or about September 12, 2017, V-9 visited a money transfer service located in

Silverdale, Washington, and at approximately 3:14 p.m., transferred \$560 via Western Union to Leslie Calister, which is an alias of **PATHAN**. At approximately 5:46 p.m., **PATHAN** retrieved the \$560 via Western Union from a money transfer service located in Arlington, Virginia, within the Eastern District of Virginia, using a fraudulent driver's license bearing the name Leslie Carter. **PATHAN** used the address of 6710 Commerce Street in Springfield, Virginia, which is the location of a Courtyard by Marriot hotel. An Ohio driver's license with the name Leslie Calister was found in **PATHAN**'s residence on September 13, 2017.

VICTIM-10 ("V-10")

40. In the summer of 2017, an individual identified herein as VICTIM-10 ("V-10") received in the mail a flyer from "Ocwen Homeward." The flyer advertised the chance to refinance V-10's mortgage. V-10 called the phone number on the flyer and was told by a person that V-10 qualified for a less expensive mortgage rate but, in order to obtain the lower rate, V-10 was required to pay the associated costs via MoneyGram and Western Union. On or about September 12, 2017, V-10 visited a Western Union location inside a Kmart in Ontario, California, and at approximately 12:13 p.m., transferred \$713 to Leslie Calister, which is an alias of **PATHAN**. At approximately 12:54 p.m., **PATHAN** retrieved the \$713 via Western Union from a money transfer service located in Arlington, Virginia, within the Eastern District of Virginia, using a fraudulent driver's license bearing the name Leslie Carter. **PATHAN** used address of 6710 Commerce Street in Springfield, Virginia, which is the location of a Courtyard by Marriot hotel. An Ohio driver's license with the name Leslie Calister was found in **PATHAN**'s residence on September 13, 2017.

CONCLUSION

41. Based on the information contained herein, I respectfully submit that there is probable cause to believe that, from April 2017 to September 13, 2017, **ANIKKHAN**

YUSUFKHAN PATHAN knowingly devised and intended to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice to defraud, knowingly transmitted and caused to be transmitted by means of wire communications in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.


Respectfully submitted,



Warren Buckley
Special Agent
Department of Homeland Security
Office of Inspector General

Sworn and subscribed to before me

On this 22nd day of November, 2019.


Michael S. Nachmanoff
United States Magistrate Judge

The Honorable Michael S. Nachmanoff
United States Magistrate Judge